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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA and )  
PEOPLE OF THE STATE OF CALIFORNIA )  
by and through CALIFORNIA REGIONAL )  
WATER QUALITY CONTROL BOARD, )  
SAN FRANCISCO BAY REGION, )  
Plaintiffs, )  
v. )  
CITY AND COUNTY OF SAN FRANCISCO, )  
Defendant. )

Case No: 3:24-cv-02594-AMO

**UNITED STATES' UNOPPOSED  
MOTION TO LIFT STAY**

Hon. Araceli Martinez-Olguin

UNITED STATES' UNOPPOSED MOTION  
TO LIFT STAY  
Case No. 3:24-cv-02594-AMO

**UNITED STATES' UNOPPOSED MOTION TO LIFT STAY**

Plaintiff, the United States of America, hereby notifies the Court that appropriations have been restored to the Department of Justice and moves to lift the stay in the above-captioned case. The other parties in this matter do not oppose this motion.

1. On October 24, 2025, upon motion by Plaintiff, the United States of America, the Court stayed all deadlines in this matter, including a Joint Status Report due October 31, 2025, in light of a lapse in appropriations to the Department of Justice and most other Executive agencies. (ECF No. 37).

2. Under the Order, undersigned counsel “will notify the Court as soon as Congress has appropriated funds for the Department.” *Id.*

3. On November 12, 2025, the lapse in appropriations ended, when the President signed H.R. 5371— Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, so the stay is no longer necessary.

4. Under the Order, “[a]ll current deadlines for the parties are extended commensurate with the duration of the lapse of appropriations.” *Id.* This sets the deadline for the Joint Status Report as December 15, 2025 (i.e., the Monday following December 14, 2025, which is 44 days after October 31, 2025).

\* \* \*

WHEREFORE, the United States respectfully requests that the Court grant this unopposed motion and enter the attached proposed order to lift the stay of the case and extend all current deadlines commensurate with the duration of the lapse in appropriations. A copy of the proposed order has been sent to Chambers via electronic mail.

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Respectfully submitted,

Dated: November 17, 2025

ADAM R.F. GUSTAFSON  
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By: s/ Sheila McAnaney

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